

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

In re: BAIR HUGGER FORCED AIR
WARMING DEVICES PRODUCTS
LIABILITY LITIGATION

MDL No. 15-2666 (JNE/FLN)

This Document Relates To:
All Actions

**DECLARATION OF BENJAMIN W.
HULSE IN SUPPORT OF
DEFENDANTS' RESPONSE TO
PLAINTIFFS' OBJECTION TO
RULING OF MAGISTRATE JUDGE
ON PUNITIVE DAMAGES**

Benjamin W. Hulse, being first duly sworn, deposes and declares:

I am an attorney at the law firm of Blackwell Burke P.A., and one of the attorneys representing 3M Company ("3M") and Arizant Healthcare Inc. ("Arizant") (together, "Defendants") in this litigation. I submit this declaration in support of Defendants' Response to Plaintiffs' Objection to Ruling of Magistrate Judge on Punitive Damages. Unless otherwise stated, the facts set forth herein are based upon my personal knowledge, information, and belief.

1. Attached as Exhibit A is a true and correct copy of the Ramsey County Court's August 18, 2017 order denying Plaintiffs' motion for leave to amend.

I declare under penalty of perjury that the foregoing is true and correct.

Executed in Minneapolis, Minnesota, this 24th day of August, 2017.

s/ Benjamin W. Hulse
Benjamin W. Hulse